

# Exhibit 35

Tariq Shaukat  
10/15/2020

14 to 17

<p style="text-align: right;">Page 14</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 related to this case at any point in time?</p> <p>3 A. I believe I searched -- in the course</p> <p>4 of ER, the Employee Relations investigation, I</p> <p>5 believe I searched for a couple of documents to</p> <p>6 refresh my memory. I couldn't tell you which</p> <p>7 documents they were. I do just have a</p> <p>8 recollection of searching for some e-mails in</p> <p>9 particular.</p> <p>10 Q. Did you ever receive a -- what's</p> <p>11 sometimes referred to as a litigation hold notice</p> <p>12 in this case? Do you know what I'm referring to?</p> <p>13 A. I -- I do know what you're referring</p> <p>14 to. I received a lot of litigation holds in my</p> <p>15 time at Google. I could not tell you I recall it</p> <p>16 being specifically for this case at this time,</p> <p>17 but -- but I have received litigation holds.</p> <p>18 Q. Do you recall whether in response to</p> <p>19 litigation holds, you ever changed the settings in</p> <p>20 your Gmail or other systems to keep it from being</p> <p>21 automatically deleted?</p> <p>22 A. What -- in relation to litigation</p> <p>23 holds, in general, that would have been my common</p> <p>24 -- or the practice that I put in place when I</p> <p>25 first received a litigation hold, but I don't have</p>	<p style="text-align: right;">Page 16</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. So you learned of it sometime around</p> <p>3 the time of its filing; is that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And what is your understanding of</p> <p>6 what this lawsuit is about?</p> <p>7 A. My general understanding is it's in</p> <p>8 relation to the role of head of financial services</p> <p>9 in Google Cloud.</p> <p>10 I apologize, the gardener just showed</p> <p>11 up. Let me shut the door here. You may not be</p> <p>12 able to hear, my apologies.</p> <p>13 My understanding is it's in relation</p> <p>14 to her applications for the head of financial</p> <p>15 services for Google Cloud and the fact that she</p> <p>16 did not get that role.</p> <p>17 Q. Anything else that you understand</p> <p>18 about the claims that she's asserted in this case?</p> <p>19 A. Not specifically to this case, no. I</p> <p>20 have not reviewed, as I mentioned, the -- the</p> <p>21 Complaint.</p> <p>22 Q. What's your understanding of how you</p> <p>23 relate to this lawsuit?</p> <p>24 A. I was hiring manager for that</p> <p>25 position and so that's my -- my understanding as</p>
<p style="text-align: right;">Page 15</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 any recollection specifically for this case.</p> <p>3 Q. In the course of your employment at</p> <p>4 Google, did you ever have occasion to text on</p> <p>5 phones, personal devices, with employees or</p> <p>6 individuals with whom you worked?</p> <p>7 A. Not text in the -- in the form of SMS</p> <p>8 messages. We did use Google Hangouts which I did</p> <p>9 use from my phone similar to how I use e-mail from</p> <p>10 my phone.</p> <p>11 Q. Now, you know who Ulku Rowe is,</p> <p>12 correct?</p> <p>13 A. I do, yes.</p> <p>14 Q. And you're aware that she's brought a</p> <p>15 lawsuit against Google?</p> <p>16 A. I am, yes.</p> <p>17 Q. How did you become aware of that?</p> <p>18 A. I believe I either read it in the</p> <p>19 press or I was informed right before reading it in</p> <p>20 the press by Mr. Cooper and his team. I can't</p> <p>21 recall exactly.</p> <p>22 MR. GAGE: I'm going to -- yeah,</p> <p>23 again, I'm going to instruct you not to</p> <p>24 discuss any conversations with counsel.</p> <p>25 THE WITNESS: Okay.</p>	<p style="text-align: right;">Page 17</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 to what -- my relationship.</p> <p>3 Q. How old are you, Mr. Shaukat?</p> <p>4 A. I'm 48.</p> <p>5 Q. And what is your highest level of</p> <p>6 education?</p> <p>7 A. I have two Master's degrees; one in</p> <p>8 mechanical engineering and the other in public</p> <p>9 policy.</p> <p>10 Q. And when did you graduate with your</p> <p>11 second Master's?</p> <p>12 A. That would be early 1997, either</p> <p>13 January or February.</p> <p>14 Q. And when -- and which Master's degree</p> <p>15 was that?</p> <p>16 A. That was the public policy degree.</p> <p>17 Q. And when did you get your mechanical</p> <p>18 engineering Master's?</p> <p>19 A. 1995, June of 1995.</p> <p>20 Q. And so did you go immediately from</p> <p>21 your Master's in mechanical engineering to pursue</p> <p>22 your Master's of public policy?</p> <p>23 A. I did, yes.</p> <p>24 Q. And when did you receive your</p> <p>25 undergraduate degree?</p>

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<p style="text-align: right;">Page 70</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 leadership staffing colleagues.</p> <p>2 Q. And was he within your organization</p> <p>3 or did he sit in HR or recruiting or --</p> <p>4 A. He sat in what's called the</p> <p>5 Leadership Staffing Team, which is part of</p> <p>6 the -- the HR organization in Google.</p> <p>7 Q. And he provides a list. Do you see</p> <p>8 that bullet-pointed list in bold?</p> <p>9 A. I do.</p> <p>10 Q. And are those positions that were in</p> <p>11 the process of being filled in your organization?</p> <p>12 A. Yes, that's right.</p> <p>13 Q. Okay, and then these charts below,</p> <p>14 those relate to particular positions within your</p> <p>15 organization, correct?</p> <p>16 A. That's right.</p> <p>17 Q. Okay, and so the financial services</p> <p>18 vertical lead, do you see that on Page 08?</p> <p>19 A. I do see it. I don't see a page</p> <p>20 number, but I do see --</p> <p>21 Q. I'm referring to the Bates number in</p> <p>22 the bottom right-hand corner.</p> <p>23 A. Yes. The -- the last two digits, 08,</p> <p>24 yes, I do see that.</p> <p>25</p>	<p style="text-align: right;">Page 72</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Q. And what about Mr. Breslow's</p> <p>2 background made him an ideal candidate for</p> <p>3 that -- for that role?</p> <p>4 A. Stuart had been a longtime chief</p> <p>5 compliance officer to highly-respected</p> <p>6 financial institutions in the field of compliance</p> <p>7 specifically, so Morgan Stanley and then Credit</p> <p>8 Suisse.</p> <p>9 Before that he also had been a</p> <p>10 partner, subsequent to those experiences, at</p> <p>11 McKinsey focusing specifically on topics such as</p> <p>12 anti-money laundering, which was a very</p> <p>13 high-interest area for us from a product</p> <p>14 standpoint as well and so he -- and so he had both</p> <p>15 the -- and he had published a paper, I recall is</p> <p>16 the way we found him, on anti-money laundering</p> <p>17 that was quite influential on how we were thinking</p> <p>18 about the anti-money laundering space.</p> <p>19 Q. Didn't he actually come to be known</p> <p>20 to Google through Ruth Porat?</p> <p>21 A. He did not, no. At least, not to my</p> <p>22 knowledge. I -- I -- Ruth was not the person who</p> <p>23 identified him to me.</p> <p>24 Q. And so you're not aware that he was</p> <p>25</p>
<p style="text-align: right;">Page 71</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Q. Okay, and was this related to the</p> <p>2 head of the financial services vertical?</p> <p>3 A. That's right. Yes.</p> <p>4 Q. Okay, and so as of March 2nd, 2018</p> <p>5 there was an active search for that position,</p> <p>6 correct?</p> <p>7 A. Yes, whether it was -- yes,</p> <p>8 there -- there was.</p> <p>9 Q. Now, the first Box says "Director of</p> <p>10 Technology and Policy." Do you see that?</p> <p>11 A. I do.</p> <p>12 Q. And that identifies Stuart Breslow;</p> <p>13 correct?</p> <p>14 A. It does, yes.</p> <p>15 Q. At that point in time had he been</p> <p>16 selected as the person to take on that role?</p> <p>17 A. This suggests that he was being</p> <p>18 scheduled with a panel, so he was not yet selected</p> <p>19 as being interviewed.</p> <p>20 Q. What was the director's technology</p> <p>21 and policy role?</p> <p>22 A. It was to help us manage all the</p> <p>23 regulatory and compliance aspects of our Cloud</p> <p>24 business.</p> <p>25</p>	<p style="text-align: right;">Page 73</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 recommended to Google by Ruth Porat?</p> <p>2 A. Within the Google team --</p> <p>3 MR. GAGE: Objection.</p> <p>4 Go ahead.</p> <p>5 Objection, asked and answered.</p> <p>6 Go ahead.</p> <p>7 A. Within the Google recruiting process</p> <p>8 it is routine, once you're about to make an offer,</p> <p>9 to ask former colleagues if you would recommend</p> <p>10 that person.</p> <p>11 I do not know if Ruth was somebody</p> <p>12 they asked to recommend him, but he -- she was not</p> <p>13 the person who recommended him to this search, as</p> <p>14 far as I understand it.</p> <p>15 Q. Were you aware that he had a long</p> <p>16 relationship with her?</p> <p>17 A. I was aware through the interview</p> <p>18 process that he did. Prior to interviewing him, I</p> <p>19 did not, apart from the fact he had been at Morgan</p> <p>20 Stanley in the chief compliance role and she had</p> <p>21 been a longtime leader.</p> <p>22 Q. Okay, I would like you to go back to</p> <p>23 the Box now and look for Exhibit 12.</p> <p>24 MR. GAGE: Tab 12?</p> <p>25</p>

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<p style="text-align: right;">Page 86</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 it was posted on our -- on our job posting board</p> <p>3 or not.</p> <p>4 Q. And so ultimately did the four</p> <p>5 individuals we discussed earlier, Justin, Evren</p> <p>6 and Ulku, move into your organization?</p> <p>7 A. They did, yes.</p> <p>8 Q. Is this the only situation you're</p> <p>9 aware of where directors at Google moved from one</p> <p>10 group to another group?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. Could you re -- could you repeat the</p> <p>13 question, please.</p> <p>14 Q. Is this the only situation in which</p> <p>15 you're aware where directors moved from one group</p> <p>16 to another group?</p> <p>17 A. It is not.</p> <p>18 Q. Okay. What other situations are you</p> <p>19 aware of where that's happened?</p> <p>20 A. Honestly, it's a fairly -- if not</p> <p>21 routine, it's not an infrequent occurrence</p> <p>22 within -- within Google.</p> <p>23 Q. And what's the context in which it</p> <p>24 happens, as far as you're aware?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 88</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And what are you aware of with</p> <p>3 respect to that?</p> <p>4 A. You mentioned the term "internal</p> <p>5 mobility." Directors would, as would anyone</p> <p>6 inside of Google, routinely apply for other</p> <p>7 positions and be accepted for those positions and</p> <p>8 change organizations as a result of that.</p> <p>9 Q. And are you aware -- are you familiar</p> <p>10 with the term "Eng" --</p> <p>11 A. Yes.</p> <p>12 Q. -- as it's used at Google?</p> <p>13 And what does that refer to?</p> <p>14 A. Engineering.</p> <p>15 Q. And so with respect to Eng director</p> <p>16 roles, are you familiar with individuals moving</p> <p>17 among Eng director-level roles?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. I am.</p> <p>20 Q. What are you familiar with there?</p> <p>21 A. Very similar to what I mentioned</p> <p>22 earlier, that directors are free to apply for</p> <p>23 other roles and other responsibilities, and</p> <p>24 they -- if they're accepted for those jobs, they</p> <p>25 switch roles.</p>
<p style="text-align: right;">Page 87</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 A. Change in priorities, change in</p> <p>3 organizational structure, change in the personnel</p> <p>4 who are leading different functions. There's</p> <p>5 range of reasons why this could happen.</p> <p>6 Q. And are those things that are</p> <p>7 different than internal mobility, a director</p> <p>8 choosing to move on their own volition?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. Correct. These would be</p> <p>11 organizational moves, not individual moves and</p> <p>12 not -- not initiated by them.</p> <p>13 Q. And so are you aware of the</p> <p>14 circumstances where directors have had what you</p> <p>15 refer to as individual moves?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. I don't understand the question.</p> <p>18 Could you rephrase it, please?</p> <p>19 Q. Sure. I think you referred to</p> <p>20 individual moves as moves being initiated by the</p> <p>21 director as opposed to an organizational move.</p> <p>22 Are you aware of circumstances where a director</p> <p>23 has initiated a move and there has been a move?</p> <p>24 A. Yes.</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 89</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. Is that something that happens on a</p> <p>3 frequent, infrequent basis; how frequently does it</p> <p>4 happen?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I would say it's normal course of</p> <p>7 business within Google.</p> <p>8 Q. And with respect to the VP roles that</p> <p>9 you were looking to fill, were you considering</p> <p>10 internal candidates for those roles?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I would generally speaking consider</p> <p>13 any internal candidates who would apply, yes.</p> <p>14 Q. And there may be candidates who had</p> <p>15 transferable skills who could move into the role?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. There certainly could be, yes.</p> <p>18 Q. With respect to the Eng directors,</p> <p>19 were there transferable skills that facilitated</p> <p>20 internal mobility?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Yes.</p> <p>23 Q. What are those transferable skills?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. In many ways they are that if you can</p>

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90 to 93

<p style="text-align: right;">Page 90</p> <p>- TARIQ SHAUKAT -</p> <p>develop software for one area, I think the belief within Google is you can develop software for another area and so you would, in generally speaking, be considered for -- for other roles.</p> <p>Q. With respect to the three men who moved into your organization, did any of them leave your organization unit at some point?</p> <p>MR. GAGE: Objection.</p> <p>A. By "the three men," could you be more specific, please?</p> <p>Q. Sure. I'm referring to Jeff, Ben, and Evren. So with respect to Jeff, Ben and Evren, did any of those three subsequently leave your organization to go somewhere else within Google?</p> <p>A. Yes.</p> <p>Q. Who?</p> <p>A. Evren moved to a product management role within Google.</p> <p>Q. And when was that?</p> <p>A. That would be the summer of 2018.</p> <p>Q. I'm sorry, can you just repeat what role he went to?</p> <p>A. I don't recall the specific role. It</p>	<p style="text-align: right;">Page 92</p> <p>- TARIQ SHAUKAT -</p> <p>mentioned earlier, with Ulku. When the announcement was imminent I know that I met her at least once, but I don't know the time frame there. Just that the announcement would have been imminent would mean in the -- in the weeks leading up to, but I don't -- I can't be more specific than that.</p> <p>Q. So with respect to the at least one meeting you recall, what do you recall discussing with Ms. Rowe? Well, let me -- let me stop.</p> <p>Before you answer that question, do you recall a conversation separate from the conversations you've already discussed with me?</p> <p>MR. GAGE: Objection.</p> <p>A. Could you be more specific?</p> <p>Q. Sure. I think that when we were discussing those earlier conversations that you had with Ms. Rowe, you -- you phrased it in the time frame as before the announcement. Now I'm asking: Do you recall any other conversation with Ms. Rowe before the time of the announcement, that you've not already described to me, with respect to her moving to your organization?</p> <p>A. As -- as I mentioned when the</p>
<p style="text-align: right;">Page 91</p> <p>- TARIQ SHAUKAT -</p> <p>was a product management role, I believe, inside of -- inside of Google Cloud.</p> <p>Q. So at what point was it announced -- with this reorganization moving the OCTO folks into your unit, at what point was that announced?</p> <p>A. I believe -- it was springtime 2018. I don't recall the specific date that it was announced.</p> <p>Q. Did you meet or discuss with Ms. Rowe the move before it was announced?</p> <p>A. I believe so, yes.</p> <p>Q. How -- how much time before it was announced did you meet with her; how soon or how late before?</p> <p>A. I don't have any specific recollection of the time frame.</p> <p>Q. Do you recall whether it was days or weeks or months?</p> <p>A. As I mentioned earlier, once we started thinking about the transition I made it a point to -- to get briefed; and as people requested the meetings I would take the meetings and so I did have multiple conversations, as I</p>	<p style="text-align: right;">Page 93</p> <p>- TARIQ SHAUKAT -</p> <p>announcement was imminent or once we were -- once we had a date in mind and we were starting to work towards that date, I do recall meeting with Ulku to describe the role and what the structure of the vertical team would be.</p> <p>Q. And is that a different conversation than what you've already described to me?</p> <p>A. I believe so, yes.</p> <p>Q. Okay, and so how long did that conversation last?</p> <p>A. Again I don't recall any specifics, but it would be -- it would be typical for it to have been 30 to 60 minutes.</p> <p>Can you please hold on for one movement. I apologize.</p> <p>Q. Sure.</p> <p>(Discussion off the record.)</p> <p>A. Would you mind, I -- I have a personal situation here, could we take a five-minute break, please?</p> <p>Q. I'm very happy to take a five-minute break.</p> <p>A. Take care of my dog -- thank you.</p> <p>THE VIDEOGRAPHER: The time is 11:48</p>

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94 to 97

<p style="text-align: right;">Page 94</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 a.m. and we're going off the record.</p> <p>3 (Whereupon, there was a brief recess</p> <p>4 in the proceedings.)</p> <p>5 THE VIDEOGRAPHER: The time is 11:56</p> <p>6 a.m. and we're back on the record.</p> <p>7 Q. So before we broke, you were telling</p> <p>8 me about a conversation that you had with Ms. Rowe</p> <p>9 regarding her move into the -- into your</p> <p>10 organizational unit and you said it would have</p> <p>11 been somewhere in the 30 to 60- minute range. Do</p> <p>12 you recall whether you were physically present</p> <p>13 together or whether there was some other mode of</p> <p>14 communication?</p> <p>15 A. I don't recall specifically. We</p> <p>16 had -- we were based in different offices so, it</p> <p>17 would not be atypical for it to have been</p> <p>18 videoconference.</p> <p>19 Q. Where were you based?</p> <p>20 A. In Sunnyvale, California.</p> <p>21 Q. Okay, and can you tell me everything</p> <p>22 that you recall being said in that conversation?</p> <p>23 A. I recall walking her through</p> <p>24 basically what the content of the note that I</p> <p>25 subsequently sent out was describing, the</p>	<p style="text-align: right;">Page 96</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 designations that we had and so I walked her</p> <p>3 through that.</p> <p>4 I walked her through what the other</p> <p>5 roles in the industry were going to be; meaning we</p> <p>6 had a product lead, we had an engineering lead, we</p> <p>7 had an industry lead, and dotted-line marketing</p> <p>8 lead, and I think that's it. And so I recall</p> <p>9 us -- me laying that out for her, explaining what</p> <p>10 the role would be, explaining that her role would</p> <p>11 be to come in and do the global client technical</p> <p>12 lead, that this would look and feel and roles and</p> <p>13 responsibilities would be broadly in line with</p> <p>14 what she had been expected to be doing inside of</p> <p>15 OCTO with the possible exception that there would</p> <p>16 be a designated or a -- a specified list of</p> <p>17 clients that she was personally responsible for</p> <p>18 managing.</p> <p>19 That had been the practice that Will</p> <p>20 Grannis and I had with OCTO historically, but I</p> <p>21 don't know in -- in the conversations Ulku</p> <p>22 expressed surprise, surprised that she would be</p> <p>23 restricted to a certain number of accounts, that</p> <p>24 she would be asked to focus on a specific list of</p> <p>25 accounts, which led me to believe that possibly</p>
<p style="text-align: right;">Page 95</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 organizational structure that we had in place. So</p> <p>3 I described that we were standing up a group that</p> <p>4 we called the Global Client Lead Group and that</p> <p>5 that team would be focused on the business and</p> <p>6 business development and -- but dedicated to a</p> <p>7 specific list of clients that we called the Global</p> <p>8 Client List; and that we were also setting up a</p> <p>9 team that we called the Global Client Technical</p> <p>10 Lead Team and that that team would be peers of the</p> <p>11 GCLs, as we referred to them Global Client Lead,</p> <p>12 but focused more on the technical aspect. I</p> <p>13 explained that these would be focused on the</p> <p>14 priority list of clients that we would be</p> <p>15 developing. By "we" I mean myself, the sales</p> <p>16 leadership, and Diane would be developing.</p> <p>17 We would assign a list to each of the</p> <p>18 GCLs and the GCTLs, the again Global Client</p> <p>19 Leads and the Global Client Technical Leads, and</p> <p>20 that -- and that those individuals would be</p> <p>21 expected to really be the sponsors and actively</p> <p>22 engaged in what I call the persistent manner in</p> <p>23 those different accounts. So there was a -- a</p> <p>24 discussion about that. Those were both new</p> <p>25 functions or new characterizations and new</p>	<p style="text-align: right;">Page 97</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Will did not manage it in the way that he and I</p> <p>3 had agreed that he would manage the -- the team.</p> <p>4 Q. Do you recall anything she said to</p> <p>5 you that you've not shared so far?</p> <p>6 A. A couple of things. One was the</p> <p>7 surprise, as I mentioned. A lot of clarification</p> <p>8 about why the specifics to specific accounts, what</p> <p>9 account would they be. I told her that they were</p> <p>10 still in -- a work in process, but they would be</p> <p>11 kind of the who's who of the financial services</p> <p>12 world, our top target accounts. So she expressed</p> <p>13 surprise about that.</p> <p>14 She expressed some -- dislike is</p> <p>15 probably the right way to -- to say it, that she</p> <p>16 was not happy with that focus that I was asking</p> <p>17 for on specific global -- on specific accounts and</p> <p>18 the persistent nature of the relationship. She</p> <p>19 was very keen to understand the relationship</p> <p>20 between the global client lead and the global</p> <p>21 client technical lead and -- and the type of</p> <p>22 person we would be hiring into each one of those.</p> <p>23 She was very curious as to whether</p> <p>24 she would be asked to build out a team or not or</p> <p>25 the global client lead and I did explain to her</p>

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<p style="text-align: right;">Page 98</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 that this is -- we are expecting her to come in</p> <p>2 and build a team and lead a team of global client</p> <p>3 leads, but this was what I called the Player Coach</p> <p>4 Role, right, where she would both manage a team,</p> <p>5 but also be expected to have a certain number of</p> <p>6 accounts that she was personally responsible and</p> <p>7 accountable for.</p> <p>8</p> <p>9 Q. And so at the time you had this</p> <p>10 conversation with her, you had already had the</p> <p>11 conversation where HR had shared with you</p> <p>12 background information of her level, correct?</p> <p>13 A. Yes, that would be true.</p> <p>14 Q. Anything else you recall her saying</p> <p>15 to you in this conversation?</p> <p>16 A. Not really except, as I mentioned,</p> <p>17 she expressed her displeasure. I think she said,</p> <p>18 I have go away and think about this and I may have</p> <p>19 more questions. Or at least that's my</p> <p>20 recollection, that she said something to that</p> <p>21 effect.</p> <p>22 Q. Was there any discussion with respect</p> <p>23 to the VP of financial services role in this</p> <p>24 conversation?</p> <p>25 A. Not that I recall.</p>	<p style="text-align: right;">Page 100</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 A. I do recall the e-mail, yes.</p> <p>3 Q. And she says in the paragraph -- the</p> <p>4 second paragraph of her e-mail, "As I mentioned,</p> <p>5 the role I'm interested in is VP of Financial</p> <p>6 Services and thank you for the opportunity to be</p> <p>7 considered as a candidate." Do you see that?</p> <p>8 A. I do.</p> <p>9 Q. Do you recall her mentioning that she</p> <p>10 wanted to be considered for the VP of financial</p> <p>11 services?</p> <p>12 A. I do recall her -- her mentioning</p> <p>13 that, yes.</p> <p>14 Q. And was that in the conversation that</p> <p>15 you've just described to me or was that in a</p> <p>16 different conversation or do you not have a</p> <p>17 reaction?</p> <p>18 A. I didn't specifically recall that.</p> <p>19 This e-mail would suggest that it was, but I do</p> <p>20 not specifically recall that.</p> <p>21 Q. Other than a general statement that</p> <p>22 she wanted to be considered for the position, do</p> <p>23 you recall anything else that was said with</p> <p>24 respect to the VP of financial services position?</p> <p>25 A. In -- in the conversation that she</p>
<p style="text-align: right;">Page 99</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Not that I recall.</p> <p>4 Q. Okay. I would like you to go back to</p> <p>5 the Box, and you may need to refresh again, and</p> <p>6 we're now going to look at Tab 22.</p> <p>7 A. Sorry, I'm still finding it.</p> <p>8 Tab 22, okay. Got it.</p> <p>9 Q. Okay. We're going to mark this as</p> <p>10 Exhibit 29. This would be Exhibit 29 and it's</p> <p>11 Bates stamped GOOG-ROWE-00017427 through 17428.</p> <p>12 (Whereupon, Plaintiff's Exhibit 29</p> <p>13 was marked at this time.)</p> <p>14 Q. Do you recognize this document, Mr.</p> <p>15 Shaukat?</p> <p>16 A. It appears to be an e-mail exchange</p> <p>17 between me and Will Grannis and several other</p> <p>18 people.</p> <p>19 Q. And if you can go to the second page</p> <p>20 of this document --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- is this an e-mail between Ms. Rowe</p> <p>23 and yourself?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recall this e-mail?</p>	<p style="text-align: right;">Page 101</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1</p> <p>2 did ask to be considered I told her that I would</p> <p>3 of course, if she wanted to apply for the role,</p> <p>4 consider her as was my normal policy with internal</p> <p>5 people raising their hand for the role and I</p> <p>6 believe I alluded to that in the response here as</p> <p>7 well.</p> <p>8 Q. Okay. Other than that, was there</p> <p>9 anything else you recall being discussed with</p> <p>10 respect to the VP of financial services position?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. In the conversation in which she</p> <p>13 expressed an interest, she asked me what I was</p> <p>14 looking for and I gave her a general description</p> <p>15 of the -- of the -- not financial services</p> <p>16 specific role, but of the industry lead role in</p> <p>17 general using Greg Moore as a reference case</p> <p>18 and -- and that was in the same conversation in</p> <p>19 which she expressed interest in the role -- in</p> <p>20 applying for the role.</p> <p>21 Q. Anything else you recall?</p> <p>22 A. No.</p> <p>23 Q. And at the time, do you recall where</p> <p>24 the financial services search was in terms of the</p> <p>25 process?</p>



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126 to 129

<p style="text-align: right;">Page 126</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 something like that. I'm not sure exactly how I</p> <p>3 said it, but it was basically what do you think we</p> <p>4 should be doing in the industry.</p> <p>5 Q. And just to be clear: You didn't</p> <p>6 tell her that she was interviewing for the VP of</p> <p>7 financial services role in that conversation, did</p> <p>8 you?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. She was not interviewing for the VP</p> <p>11 of financial services role in that conversation.</p> <p>12 Q. Did you in that conversation tell her</p> <p>13 that you were evaluating her for the VP of</p> <p>14 financial services position in that conversation?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. No, and I don't believe I was</p> <p>17 evaluating her specifically for that. I was</p> <p>18 trying to get to know her.</p> <p>19 Q. Okay, you can close out of that</p> <p>20 document.</p> <p>21 Do you recall whether Ms. Rowe</p> <p>22 contacted you to discuss the VP of financial</p> <p>23 services role?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. I -- I don't recall. As the</p>	<p style="text-align: right;">Page 128</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 p.m. and we're going on the record.</p> <p>3 (Whereupon, a lunch break was taken</p> <p>4 from 12:43 p.m. to 1:17 p.m.)</p> <p>5 VIDEOGRAPHER: The time is 1:17 p.m.</p> <p>6 and we're back on the record.</p> <p>7 Q. Okay. Continuing on: If you go to</p> <p>8 the Box, Mr. Shaukat, and I would like you to look</p> <p>9 at Tab 26.</p> <p>10 A. Okay.</p> <p>11 Q. We're going to mark this as Exhibit</p> <p>12 33. It has the Bates number GOOG-ROWE-00056487</p> <p>13 through 88.</p> <p>14 (Whereupon, Plaintiff's Exhibit 33</p> <p>15 was marked at this time.)</p> <p>16 Q. Do you recognize this document?</p> <p>17 A. It appears to be an e-mail between me</p> <p>18 and Diane Greene.</p> <p>19 Q. From June of 2018, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And I'm going to direct your</p> <p>22 attention to the e-mail with the date and time</p> <p>23 stamp of June 22nd, 2018 at 8:07 a.m. Do you see</p> <p>24 that?</p> <p>25 A. Yup.</p>
<p style="text-align: right;">Page 127</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 discussion -- as the note that we just saw</p> <p>3 indicates, it was part of the conversation we had</p> <p>4 about the move which would be a meeting that I</p> <p>5 scheduled, not that she scheduled, but I don't</p> <p>6 know that I -- I have no understanding beyond what</p> <p>7 we see in the e-mails.</p> <p>8 MS. GREENE: I just looked up at the</p> <p>9 time and it's 12:45 Eastern Time. It occurs</p> <p>10 to me this might be a good time for a short</p> <p>11 lunch break particularly, you know, for Hope</p> <p>12 and our videographer. How long did you need,</p> <p>13 Mr. Shaukat, yourself; 30 minutes 45, which</p> <p>14 is your preference?</p> <p>15 THE WITNESS: I'm good with a very</p> <p>16 short break of 15 minutes or -- whatever is</p> <p>17 suitable for everyone else here, but I don't</p> <p>18 need that much time. I don't need much time.</p> <p>19 MS. GREENE: Well, out of courtesy to</p> <p>20 those whose hands have been typing, I like to</p> <p>21 at least give them a 30-minute break, if not</p> <p>22 longer.</p> <p>23 MR. GAGE: I think we could probably</p> <p>24 go off the record for this.</p> <p>25 THE VIDEOGRAPHER: The time is 12:43</p>	<p style="text-align: right;">Page 129</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And do you see the paragraph that</p> <p>3 says, "Ulku from OCTO is also very interested. I</p> <p>4 don't think she's likely right, but I told her I</p> <p>5 would formally interview her for the role." Do</p> <p>6 you see that?</p> <p>7 A. I do.</p> <p>8 Q. Does that fairly reflect your view as</p> <p>9 of June 22nd, 2018?</p> <p>10 A. I believe so. I wouldn't have</p> <p>11 written it otherwise I guess. I have no reason to</p> <p>12 believe it doesn't. Oh, sorry, I said I have no</p> <p>13 reason to believe it doesn't. Again, I wouldn't</p> <p>14 have told Diane otherwise.</p> <p>15 Q. Okay. I want you to go back to the</p> <p>16 Box. You can close that document out.</p> <p>17 A. Okay.</p> <p>18 Q. And look at Tab 32.</p> <p>19 A. Tab 32, I have it open.</p> <p>20 Q. We're going to mark this as Exhibit</p> <p>21 34 with the Bates stamp GOOG-ROWE-00017499 through</p> <p>22 17501.</p> <p>23 (Whereupon, Plaintiff's Exhibit 34</p> <p>24 was marked at this time.)</p> <p>25 Q. Do you recognize this document?</p>



<p style="text-align: right;">Page 142</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. So who were the other qualified VP</p> <p>3 women who could have served on this interview</p> <p>4 panel?</p> <p>5 A. So now we're -- I have -- I have to</p> <p>6 recall who was at what level back in those days,</p> <p>7 so I'm -- so this one is going to be a little bit</p> <p>8 hard.</p> <p>9 There was Olivia who I mentioned in</p> <p>10 the go-to-market organization. There was Carolee</p> <p>11 Gearhart who I can't recall if Carolee joined at</p> <p>12 this time or later, but I often asked her to do</p> <p>13 interviews as well on some of my interview panels</p> <p>14 at the VP level. So from the go-to-market</p> <p>15 organization, those would be the two women that we</p> <p>16 would typically -- that I would tap into as the</p> <p>17 two senior VPs in the go-to market or the customer</p> <p>18 organization, as I referred to it earlier.</p> <p>19 In -- in my team, VPs in general were</p> <p>20 in short supply. I only had the one at the time</p> <p>21 which was Greg Moore and so my team did not have</p> <p>22 any VP at that point, male or female, apart from</p> <p>23 Greg Moore; and Darryl Willis joined as the VP of</p> <p>24 Energy at this time as -- as well, but that --</p> <p>25 that was a fairly small pool in my org; and on</p>	<p style="text-align: right;">Page 144</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 honestly was the best read of leadership and</p> <p>3 culture fit that I've seen in my team at Google;</p> <p>4 so I -- I normally would ask her to carve out a</p> <p>5 time for this.</p> <p>6 Again, this was one of many and so</p> <p>7 I'm not 100 percent sure that she was asked here,</p> <p>8 but it would not have been atypical for me to have</p> <p>9 asked her for a role like this.</p> <p>10 Q. Are you aware that Ms. Rowe was</p> <p>11 interviewed in connection with the head of</p> <p>12 financial services role?</p> <p>13 A. As part of -- of the weekly updates I</p> <p>14 would get from Stuart, I would be apprised on the</p> <p>15 status of all the candidates including Ulku, yes.</p> <p>16 Q. And do you know who interviewed her?</p> <p>17 A. Again, I remember Sebastien --</p> <p>18 reading Sebastien's feedback. I remember reading</p> <p>19 Jason Martin's feedback. I believe that Brian</p> <p>20 Stevens recused himself from her interview given</p> <p>21 his earlier statement that he thought that she was</p> <p>22 a good candidate for the role, but I don't know</p> <p>23 that for a fact. It's just sort of a vague</p> <p>24 recollection that I have at this point. So I</p> <p>25 remember Sebastien and I remember Jason. I don't</p>
<p style="text-align: right;">Page 143</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 occasion Suzanne Frey who was a VP in the</p> <p>3 engineering org would do a lot of interviews for</p> <p>4 me, but I believe she was promoted to VP in</p> <p>5 November of that year, if I'm recalling correctly.</p> <p>6 So there -- there were other people</p> <p>7 besides Olivia, but they -- candidly at the VP</p> <p>8 level who had the expertise that we needed. It</p> <p>9 wasn't as large a pool as I would have liked.</p> <p>10 Q. And you can't recall if you asked</p> <p>11 Olivia to serve on this panel, is that your</p> <p>12 testimony?</p> <p>13 A. I generally asked Olivia to serve on</p> <p>14 many of my panels. Whether this one in</p> <p>15 particular, this was one of -- I had literally</p> <p>16 dozens of searches that I did, so I don't recall</p> <p>17 if I asked her on this one or not; and Becky</p> <p>18 Bucich was another VP inside of Google Cloud that</p> <p>19 we did -- that I did ask quite a lot and I believe</p> <p>20 she was on the interview panel here as -- as well.</p> <p>21 Q. You believe she was on the interview</p> <p>22 panel for the head of financial services?</p> <p>23 A. I believe so. She was typically for</p> <p>24 the industry lead roles, but -- because we were</p> <p>25 looking for leadership in culture fit and Becky</p>	<p style="text-align: right;">Page 145</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 remember the others.</p> <p>3 Q. So you recall Jason giving you</p> <p>4 written feedback?</p> <p>5 A. I remember Jason providing feedback</p> <p>6 at a minimum through Stuart. I don't actually</p> <p>7 know, it -- it wasn't my practice, as I mentioned</p> <p>8 earlier, in going to Ghire and read the feedback.</p> <p>9 I would more hear the feedback from the weekly</p> <p>10 updates I had with the -- excuse me, with the</p> <p>11 recruiting team.</p> <p>12 Q. And so if Jason did give feedback, it</p> <p>13 would be reflected in Ghire?</p> <p>14 A. I -- as I mentioned earlier, I think</p> <p>15 compliance was reflecting feedback in Ghire.</p> <p>16 I -- I can't speak to what the rates are, but</p> <p>17 I -- I'm not certain. I have no way of validating</p> <p>18 that people did do that or not, I guess.</p> <p>19 Q. Well, if Stuart had gotten feedback</p> <p>20 from Jason, would it be reflected somewhere?</p> <p>21 A. If Stuart Vardaman had gotten</p> <p>22 feedback from Jason, I would assume it would be</p> <p>23 been in Stuart's notes. I don't know what his</p> <p>24 note-taking capabilities are and I don't know</p> <p>25 if -- if Stuart entered it into Ghire or kept it</p>

<p style="text-align: right;">Page 146</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 in a Google Doc or other some other form. I</p> <p>3 just -- I don't know what his practice was. I</p> <p>4 know what he showed me, which was -- and the</p> <p>5 discussion that we had.</p> <p>6 Q. Particularly with respect to Jason?</p> <p>7 A. No, in -- in general.</p> <p>8 Q. Okay. What do you recall Stuart</p> <p>9 telling you about feedback he had gotten from</p> <p>10 Jason?</p> <p>11 A. I don't --</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Sorry.</p> <p>14 MR. GAGE: I said objection.</p> <p>15 A. I don't recall this -- I -- I recall</p> <p>16 the general feedback between Sebastien and Jason.</p> <p>17 I don't recall specially what came from Jason and</p> <p>18 what came from Sebastien. The general feedback</p> <p>19 was that they had a hard time understanding and</p> <p>20 getting Ulku to articulate a vision for the</p> <p>21 financial services industry, to articulate the</p> <p>22 business needs that she felt the industry was</p> <p>23 facing that Google Cloud could help with, and</p> <p>24 they -- they were unclear whether she would be</p> <p>25 able to lay out or she didn't demonstrate I guess</p>	<p style="text-align: right;">Page 148</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 they should, but it would be a discussion with</p> <p>3 Stuart about status, general feedback, any</p> <p>4 specific concerns, next step; and that's sort of a</p> <p>5 routine we did week for every role that we got.</p> <p>6 And in my case I actually insisted on</p> <p>7 doing it for what I considered the leadership</p> <p>8 roles in my team that -- even if they didn't</p> <p>9 report to me, just so I understood what my team</p> <p>10 was doing. So leadership roles would either be</p> <p>11 roles that -- typically they would be roles that</p> <p>12 report directly to people who report to me.</p> <p>13 Sometimes those would be directors, sometimes they</p> <p>14 would be manager-level folks.</p> <p>15 In addition to that, you know, I</p> <p>16 worked with Jason, Sebastien, Brian on a daily</p> <p>17 basis and it would not be atypical for them to</p> <p>18 have say oh, by the way, I interviewed so-and-so,</p> <p>19 here's what I thought, I'm going to give the</p> <p>20 feedback to Stuart, there's no reason to keep it</p> <p>21 from him; and, in fact, when they had an</p> <p>22 opportunity for a conversation they would often</p> <p>23 volunteer that.</p> <p>24 I don't have any specific</p> <p>25 recollection of them doing with Ulku. As I</p>
<p style="text-align: right;">Page 147</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 that she would be able to lay out a product</p> <p>3 mandate, for lack a better word, for the vertical.</p> <p>4 And so that was the consistent</p> <p>5 impression that I got from the interviews with</p> <p>6 Sebastien and Jason, but I don't remember</p> <p>7 specifically what each one of them said and I'm</p> <p>8 not sure I was ever told specifically what each</p> <p>9 one of them said.</p> <p>10 Q. So if you -- let's break this down.</p> <p>11 Who did you have conversations with regarding how</p> <p>12 Ms. Rowe's interviews went?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. So I had a standing weekly meeting</p> <p>15 with the leadership staffing team led by Stuart</p> <p>16 Vardaman. In that standing weekly meeting, Stuart</p> <p>17 would update me on the status of each of the</p> <p>18 candidates in the pipeline. He would do that by</p> <p>19 providing at least a verbal -- in some cases</p> <p>20 bullet pointed, but in some cases a verbal summary</p> <p>21 of the feedback that was provided from the</p> <p>22 interviewers; and in some cases -- in many cases</p> <p>23 he would say, I need your help chasing feedback</p> <p>24 because I haven't gotten it yet. People get busy</p> <p>25 and they don't necessarily send the e-mails that</p>	<p style="text-align: right;">Page 149</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 mentioned, she was one of many industry leads and</p> <p>3 senior hires we were trying to hire at the time</p> <p>4 or she was interviewing for one of the roles that</p> <p>5 we were -- in one of the many roles that we were</p> <p>6 interviewing for at the time. So I don't -- it --</p> <p>7 it would not have been unlikely. I can't tell you</p> <p>8 I didn't have a direct conversation with them, but</p> <p>9 I don't have a specific recollection of them</p> <p>10 sending me a Hangout message or a verbal</p> <p>11 conversation or anything like that.</p> <p>12 Jason's office and my office during</p> <p>13 this time were across the hall from each other, as</p> <p>14 an example, so we had casual conversations about</p> <p>15 business in my office or in his office quite</p> <p>16 frequently.</p> <p>17 Q. Okay. Do you recall specifically</p> <p>18 having a conversation with Stuart Vardaman</p> <p>19 regarding the feedback from the interviews with</p> <p>20 Ms. Rowe?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. As I just mentioned, I recall</p> <p>23 having -- I rec -- I recall in the standing</p> <p>24 meeting having Stuart tell me the feedback that</p> <p>25 had come through the initial round of interview</p>

<p style="text-align: right;">Page 150</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 candidates, yes, and -- and including Ulku,</p> <p>2 specific to Ulku, yes.</p> <p>3 Q. And what do you recall him saying to</p> <p>4 you specifically with respect to Ms. Rowe?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. So, as I -- as I just mentioned, he</p> <p>7 said that the -- the interviews had happened. He</p> <p>8 said that generally speaking people feel quite</p> <p>9 comfortable with her technical capability, but</p> <p>10 there were concerns around what I'll term</p> <p>11 broadly as the -- as the business aspects of that;</p> <p>12 meaning specifically her ability to articulate</p> <p>13 a prop -- a vision for the industry, articulate</p> <p>14 a value proposition for Google Cloud in the</p> <p>15 industry that would be differentiated versus other</p> <p>16 potential offerings in the industry that would be</p> <p>17 translatable to a product level, which was really</p> <p>18 one of the core things that we were solving for</p> <p>19 was who could help us figure out what products to</p> <p>20 build and how to position those in the market.</p> <p>21 They did not see evidence, or they did not believe</p> <p>22 I should say, coming out of the discussion that</p> <p>23 Ulku demonstrated that she had the prod -- the</p> <p>24 product vision or the ability to develop a product</p> <p>25</p>	<p style="text-align: right;">Page 152</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 her? Did he share with you that Vat liked her?</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. Honestly, I didn't remember that Vat</p> <p>4 had interviewed her so I don't recall whether he</p> <p>5 shared that Vat liked her or not. He's not</p> <p>6 someone I recall being on the interview panel.</p> <p>7 Q. Did he share with you that Darryl</p> <p>8 liked her?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. Again I did not recall that Darryl</p> <p>11 was on the interview panel, so I don't recall him</p> <p>12 saying that.</p> <p>13 Q. Okay. So you had a conversation with</p> <p>14 Stuart. Who else do you specifically recall</p> <p>15 having a conversation with regarding Ms. Rowe's</p> <p>16 interview?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I don't have a specific -- I don't</p> <p>19 recall having a specific conversation with anybody</p> <p>20 else, that I can remember.</p> <p>21 Q. And by conversations I'm including a</p> <p>22 conversation, a Google Hangout, a videoconference,</p> <p>23 anything other than just an e-mail communication;</p> <p>24 does that change your answer?</p> <p>25</p>
<p style="text-align: right;">Page 151</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 vision for the industry.</p> <p>2 So there was no negative feedback.</p> <p>3 There was only positive feedback on the technical</p> <p>4 side and there were questions and concerns on the</p> <p>5 nontechnical side, and I'll include product</p> <p>6 management as the nontechnical in -- in that</p> <p>7 description.</p> <p>8 Q. Did Mr. Vardaman share with you from</p> <p>9 where the feedback was coming, how he gathered</p> <p>10 this feedback?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I don't -- Stuart's normal expression</p> <p>13 was I'm chasing everybody and here's what I got,</p> <p>14 but I don't know in this case how he got the</p> <p>15 feedback. I don't know what that would have</p> <p>16 translated into in this case.</p> <p>17 Q. When did he share that feedback with</p> <p>18 you?</p> <p>19 A. I -- it would have been the week or</p> <p>20 two depending on when we met after that round of</p> <p>21 interviews with Ulku, but I don't know even</p> <p>22 roughly when that was. Yeah -- yeah, I don't know</p> <p>23 when that was.</p> <p>24 Q. Did he share with you that Vat liked</p> <p>25</p>	<p style="text-align: right;">Page 153</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 A. It doesn't. I'm just trying to</p> <p>2 remember. I have a very vague recollection of</p> <p>3 telling Brian that several of the interviews</p> <p>4 didn't go well, that there were some concerns</p> <p>5 raised, but I can't -- but it's a very faint</p> <p>6 recollection and I don't know, I -- I can't recall</p> <p>7 anymore details about that conversation, but</p> <p>8 that's the only one that's even vaguely coming to</p> <p>9 mind.</p> <p>10 Q. Give me just a moment.</p> <p>11 Okay, I would like you to look in the</p> <p>12 Box again and we're going to be looking at Tab 38.</p> <p>13 We're going to mark it as Exhibit 35 and it has</p> <p>14 the Bates stamp number GOOG-ROWE-00017533 through</p> <p>15 38.</p> <p>16 (Whereupon, Plaintiff's Exhibit 35</p> <p>17 was marked at this time.)</p> <p>18 Q. Do you recognize this document?</p> <p>19 A. It appears to be an e-mail from me to</p> <p>20 Sebastien Marotte.</p> <p>21 Q. And is this the same Sebastien that</p> <p>22 we have been discussing?</p> <p>23 A. It is, yes.</p> <p>24 Q. And do you see on Wednesday, August</p> <p>25</p>

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<p style="text-align: right;">Page 158</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Normally I would be the gatekeeper before it goes</p> <p>2 to panel and in this case we were skipping the</p> <p>3 gatekeeper.</p> <p>4</p> <p>5 So I did have that conversation quite</p> <p>6 explicitly with Stuart and that again, would not</p> <p>7 be atypical for somebody who I had had some</p> <p>8 experience with who would be an internal</p> <p>9 candidate, but anything more detailed than that I</p> <p>10 don't believe I had a conversation with him about.</p> <p>11 Q. And in wanting to be late to the</p> <p>12 interview process in that -- in this case, does</p> <p>13 that mean that you ended up not interviewing her</p> <p>14 at all for the position?</p> <p>15 A. I don't believe I interviewed her for</p> <p>16 the position so, yes, that would be correct.</p> <p>17 Q. Now, I would like you to take look at</p> <p>18 Tab 44.</p> <p>19 A. Okay.</p> <p>20 Q. And we are going to mark this as</p> <p>21 Exhibit 37 and it has the Bates number</p> <p>22 GOOG-ROWE --</p> <p>23 MS. GREENE: Oh, you know what</p> <p>24 actually, can you take that down for a</p> <p>25 moment?</p>	<p style="text-align: right;">Page 160</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 MS. GREENE: Sure. Sure, and I</p> <p>2 apologize, I just hasn't processed that one</p> <p>3 was AEO and the others were just</p> <p>4 Confidential.</p> <p>5</p> <p>6 Ms. Gelfand, can you please put it</p> <p>7 back into the share drive and</p> <p>8 then (unintelligible crosstalk) Mr. Gage can</p> <p>9 review it.</p> <p>10 MS. GELFAND: Yeah, it should be back</p> <p>11 up.</p> <p>12 MR. GAGE: Sure, let me refresh.</p> <p>13 That's fine.</p> <p>14 MS. GREENE: Okay, thank you.</p> <p>15 MR. GAGE: We -- we have no</p> <p>16 objection.</p> <p>17 MS. GREENE: Okay.</p> <p>18 Q. Now, Mr. Shaukat if you could open</p> <p>19 that Tab 44 and we're marking it as Exhibit 37,</p> <p>20 and again the Bates number is GOOG-ROWE-00017565.R</p> <p>21 through 66.</p> <p>22 (Whereupon, Plaintiff's Exhibit 37</p> <p>23 was marked at this time.)</p> <p>24 Q. Do you recognize this document?</p> <p>25 A. It appears to be an e-mail from</p>
<p style="text-align: right;">Page 159</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 MS. GELFAND: Sure.</p> <p>2 Q. And can you close out of this for a</p> <p>3 moment, Mr. Shaukat.</p> <p>4</p> <p>5 A. I have closed it.</p> <p>6 MS. GREENE: Mr. Gage, I -- I just</p> <p>7 noticed that this document is marked</p> <p>8 "Attorneys Eyes Only." I'm not sure if that</p> <p>9 was a correct designation. I would note that</p> <p>10 he is a recipient of this e-mail. I want</p> <p>11 to -- before he reviews it to see if you have</p> <p>12 any objection to us showing this to him in</p> <p>13 the course of this deposition. If you do,</p> <p>14 I'm -- I'm happy to not show it to him or if</p> <p>15 you need more time to review it, I'm fine</p> <p>16 with delaying this.</p> <p>17 MR. GAGE: I -- I probably have no</p> <p>18 problem, but I would like to look at it and</p> <p>19 it's no longer there so I can't look at it</p> <p>20 so...</p> <p>21 MS. GREENE: You know what we'll</p> <p>22 do --</p> <p>23 MR. GAGE: Why don't you put it back</p> <p>24 up and ask the witness not to open it. I'll</p> <p>25 take a quick look and --</p>	<p style="text-align: right;">Page 161</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Stuart Vardaman to me on September 1st, 2018.</p> <p>2 Q. Okay, and if you can look at the</p> <p>3 bullet, particularly the one bullet "FSI," do you</p> <p>4 see that?</p> <p>5</p> <p>6 A. I do.</p> <p>7 Q. And it says; "Ulku has been in the</p> <p>8 ether for a bit. It doesn't sound like she is</p> <p>9 viable for -- Ulku -- "Ulku has been in the ether</p> <p>10 for a bit. It doesn't sound like she is viable</p> <p>11 for the VP role. Do we position her as the Global</p> <p>12 Client Technical Director L 8?" Do you see that?</p> <p>13 A. I do.</p> <p>14 Q. Is that -- was that your view as to</p> <p>15 Ms. Rowe's candidacy in September of 2018, that</p> <p>16 she was not viable for the VP role?</p> <p>17 A. I don't recall if it was my view.</p> <p>18 I -- it would depend on when the feedback from</p> <p>19 Sebastien and Jason came in, but once we received</p> <p>20 the negative feedback from those interviews on the</p> <p>21 business dimensions, then we started suspecting</p> <p>22 that she was not going to end up being the</p> <p>23 finalist for the role.</p> <p>24 Q. So as of September of 2018, was it</p> <p>25 your view or did you have a view as to whether she</p>

<p style="text-align: right;">Page 162</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 was viable for the role?</p> <p>3 MR. GAGE: Objection, asked and</p> <p>4 answered.</p> <p>5 A. I -- again, I don't know the specific</p> <p>6 timing what my view was. I know that it would be</p> <p>7 after I received the feedback from Jason and</p> <p>8 Sebastien, but I don't know that feedback in</p> <p>9 relation to September 1st, 2018.</p> <p>10 Q. What do you recall with respect to</p> <p>11 Ms. Rowe interviewing with Diane Greene?</p> <p>12 A. Once we decided that Ulku was not</p> <p>13 going to be a finalist because of the interview</p> <p>14 feedback that we had received, I moved into</p> <p>15 retention mode because I did value Ulku and did</p> <p>16 want her to join the team and to make the</p> <p>17 transition that we had been trying to enact work;</p> <p>18 and I thought that having a courtesy meeting with</p> <p>19 Diane would be helpful in -- in assisting us in</p> <p>20 retaining Ulku.</p> <p>21 I suspected, and Ulku said at the</p> <p>22 time, that if she didn't get the -- the FSI Lead</p> <p>23 role that she would leave Google which is not an</p> <p>24 outcome that I wanted to see because, as the</p> <p>25 interviews noted, she was quite strong on the</p>	<p style="text-align: right;">Page 164</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 time she had been recruited into Google, it was</p> <p>3 with the expectation that she would get this role</p> <p>4 once financial services verticalized?</p> <p>5 A. She asserted to me that that had been</p> <p>6 told to her, yes.</p> <p>7 Q. When did she assert that to you?</p> <p>8 A. When she threw her hat in the ring in</p> <p>9 the very beginning, so that would be I guess in</p> <p>10 June, 2018 and possibly subsequent to that as</p> <p>11 well. I believe I had a conversation -- or not I</p> <p>12 believe. I know I had a conversation with her in</p> <p>13 December, 2018 in which I did finally close out</p> <p>14 the role and I believe she reiterated then that</p> <p>15 she believed she had been promised the role.</p> <p>16 Q. At the time she asserted that, did</p> <p>17 she say who had promised her the role?</p> <p>18 A. She said Will Grannis had -- had led</p> <p>19 her to believe, I believe was the expression, that</p> <p>20 that was the case. I asked for more detail. She</p> <p>21 didn't provide me with any more detail as a part</p> <p>22 of that.</p> <p>23 Q. Did you talk to Will about that?</p> <p>24 A. I raised it to Will and Brian and</p> <p>25 said was this in fact the case and they both</p>
<p style="text-align: right;">Page 163</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 technical side of things. So the -- the Diane</p> <p>3 meeting was meant to be part of an -- an attempt</p> <p>4 to make her comfortable and happy with the role</p> <p>5 that we did think she was a very good fit for.</p> <p>6 Q. Did you tell her it was an interview</p> <p>7 in connection with the VP of financial services</p> <p>8 role?</p> <p>9 A. The "her" in this case would be who?</p> <p>10 Q. Ulku.</p> <p>11 A. I don't know if I actually told Ulku</p> <p>12 anything, except that we would schedule a meeting</p> <p>13 with Diane. I'm not sure what -- what Stuart said</p> <p>14 to her about it, but -- and it's certainly the</p> <p>15 case that we did not close Ulku out at this point</p> <p>16 and tell her that we didn't think she was a</p> <p>17 finalist candidate in part. Because Brian did</p> <p>18 feel so strongly about it, I wanted her to meet</p> <p>19 Diane as I mentioned from a -- from a retention</p> <p>20 standpoint, but if Diane thought we had the wrong</p> <p>21 read on it that we might go back and take a look.</p> <p>22 So we definitely did not tell Ulku that she was</p> <p>23 not getting through to the next round as part of</p> <p>24 setting up the meeting with Diane.</p> <p>25 Q. Did Ulku tell you that she -- at the</p>	<p style="text-align: right;">Page 165</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 denied that being the case.</p> <p>3 Q. When did you raise it with Will and</p> <p>4 Brian?</p> <p>5 A. It likely was right after. I</p> <p>6 don't -- I remember the conversation. I don't</p> <p>7 remember when it was, but it would have been -- I</p> <p>8 was fairly surprised at the assertion and so it</p> <p>9 would have been probably right afterwards or</p> <p>10 whenever I could reach them right afterwards.</p> <p>11 Q. So this is a conversation that you've</p> <p>12 not previously talked about that you're now</p> <p>13 remembering --</p> <p>14 MR. GAGE: Objection.</p> <p>15 Q. -- is that right?</p> <p>16 MR. GAGE: Objection. You haven't</p> <p>17 asked him about this conversation.</p> <p>18 A. I did not recall this being part of</p> <p>19 the conversation when Ulku threw her hat in the</p> <p>20 ring until you referenced it and then it did spark</p> <p>21 the recollection.</p> <p>22 Q. Okay, and with respect to the</p> <p>23 conversations with Will and Brian that you're now</p> <p>24 testifying about, you've not previously testified</p> <p>25 about these conversations, correct?</p>

<p style="text-align: right;">Page 202</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 p.m. and we're back on the record.</p> <p>3 Q. Mr. Shaukat, were -- the position</p> <p>4 that Ms. Rowe was brought in to into your</p> <p>5 organization, that was -- was that the global</p> <p>6 client lead role?</p> <p>7 A. I'm sorry, that she was brought into</p> <p>8 my organization or into the organization?</p> <p>9 Q. Into your -- into your organization.</p> <p>10 What was -- what was the role that she was brought</p> <p>11 into your organization?</p> <p>12 A. I think the official title we gave it</p> <p>13 was technical director of the global client team</p> <p>14 or the financial services vertical.</p> <p>15 Q. And was an informal term the -- the</p> <p>16 global client lead?</p> <p>17 A. No, it was global client technical</p> <p>18 lead. It's a slightly -- it a more technical</p> <p>19 version versus the business version.</p> <p>20 Q. Okay. So there was a global</p> <p>21 cli -- client technical lead and the global</p> <p>22 what -- what was the other --</p> <p>23 A. Sorry. There's a global client lead</p> <p>24 which was not Ulku and then there's a global</p> <p>25 client technical lead which was Ulku.</p>	<p style="text-align: right;">Page 204</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 technical lead team underneath him.</p> <p>3 Within the manufacturing vertical</p> <p>4 we brought two individuals over or into the</p> <p>5 organization, I should say. One of them named was</p> <p>6 Kanai, which is K-A-N-A -- A-I I believe and the</p> <p>7 other is Carlos. I don't recall their last names,</p> <p>8 but they came over as part of the global client</p> <p>9 technical lead structure and organization.</p> <p>10 Q. Any other global client technical</p> <p>11 leads in your organization that you recall?</p> <p>12 A. Not that I recall, no.</p> <p>13 Q. What about with respect to the global</p> <p>14 client leads, who -- who held the positions of</p> <p>15 global client leads while you were heading up the</p> <p>16 reorganization?</p> <p>17 A. So we had a number of people there as</p> <p>18 well. In the media industry we had Anil Jain who</p> <p>19 was the global client lead director, the Director</p> <p>20 of Global Client I think we called it, meaning he</p> <p>21 oversaw the entire team for the media industry.</p> <p>22 We had Caleb Weinstein who was in the team as</p> <p>23 well. Both of them were hired subsequent I</p> <p>24 believe to this reorganization that I talked</p> <p>25 about.</p>
<p style="text-align: right;">Page 203</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. Okay. Were there other people in the</p> <p>3 global client technical lead role?</p> <p>4 A. All of the people brought over from</p> <p>5 OCTO into my team joined in that role. So the</p> <p>6 folks I mentioned earlier, Ben Wilson, Jeff Kember</p> <p>7 and Evren, all came over in that global client</p> <p>8 technical lead role.</p> <p>9 Q. And were there any individuals apart</p> <p>10 from those four in the global client technical</p> <p>11 lead role?</p> <p>12 A. At the time at which we moved them</p> <p>13 over that was a new role and new structure we</p> <p>14 created given the reorganization we were doing, so</p> <p>15 there was no one else I remember in those roles.</p> <p>16 We subsequently hired some people</p> <p>17 into those roles, but at the time they came over</p> <p>18 they were newly-created roles.</p> <p>19 Q. And who did you subsequently hire</p> <p>20 into those roles?</p> <p>21 A. Let me think. So Jeff Kember, as an</p> <p>22 example, built out his team. I'm honestly</p> <p>23 blanking or forgetting the names of the</p> <p>24 individuals that he brought on to his team, but he</p> <p>25 brought several people for the media industry</p>	<p style="text-align: right;">Page 205</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And -- I'm sorry.</p> <p>3 A. In the financial -- sorry, in the</p> <p>4 healthcare world we had Paul Torrey, Amy Waldron,</p> <p>5 and Shweta Maniar. That was S-H-W-E-T-A,</p> <p>6 M-A-N-I-A-R I believe was how she spelled her</p> <p>7 name. So we had Paul, Amy and Shweta there as</p> <p>8 global client leads for healthcare.</p> <p>9 For manufacturing and automotive, we</p> <p>10 had Dominick We who came in to lead that team,</p> <p>11 and we -- let me think.</p> <p>12 Then in financial services -- I can't</p> <p>13 recall exactly what the role was that Tais</p> <p>14 O'Dwyer was brought in at. I -- my recollection</p> <p>15 is she was brought in as a global client lead,</p> <p>16 but I don't know that for certain. I -- that's my</p> <p>17 best recollection at the moment.</p> <p>18 And then we had a couple for what we</p> <p>19 called our Marketing Vertical, whose names are</p> <p>20 escaping me at the moment.</p> <p>21 Q. Okay. I would like you to look at</p> <p>22 Tab 62.</p> <p>23 A. I don't believe it's up yet.</p> <p>24 MR. GAGE: It's not showing up here</p> <p>25 at my end either.</p>



<p style="text-align: right;">Page 238</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 you.</p> <p>2 Q. Okay, and if you look at your e-mail</p> <p>3 on the next page, 906 at 11:02 a.m. on March 30th,</p> <p>4 you're discussing the staffing for the meeting; is</p> <p>5 that correct?</p> <p>6 A. The e-mail at 11:02, is that what</p> <p>7 you're referring to?</p> <p>8 Q. Yes.</p> <p>9 A. We were -- not so much the staffing</p> <p>10 for the meeting, but the executive sponsor</p> <p>11 assignment for the meeting.</p> <p>12 Q. Okay. Now, does that refresh your</p> <p>13 recollection at all in terms of how this meeting</p> <p>14 is being noticed with (inaudible).</p> <p>15 MR. GAGE: Objection. Oh, apologies.</p> <p>16 MS. GREENE: I'll repeat the</p> <p>17 question.</p> <p>18 Q. Does this refresh your recollection</p> <p>19 with respect to how much advanced notice was</p> <p>20 provided with respect to the BlackRock Aladdin</p> <p>21 meeting?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. I mean, this would indicate that it</p> <p>24 was about a week's notice. I'm not sure it</p> <p>25</p>	<p style="text-align: right;">Page 240</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 charge of that while we figured out what the</p> <p>2 long-term strategy and structure was going to be.</p> <p>3 All of that said, that would have</p> <p>4 been in I believe the November, 2018 time frame.</p> <p>5 I don't recall exactly when in November it was.</p> <p>6 It may have been late -- late October, but it was</p> <p>7 in roughly that time frame.</p> <p>8 Q. Okay, and the interim role that you</p> <p>9 referenced, that's the head of financial services,</p> <p>10 correct?</p> <p>11 A. Yes, but I would just emphasize it</p> <p>12 was not the job description that we were referring</p> <p>13 to earlier. It was a caretaker role for the</p> <p>14 existing team while we figured out what the future</p> <p>15 scope was going to be for the vertical and for the</p> <p>16 role.</p> <p>17 Q. Was that before or after it was</p> <p>18 communicated to Ms. Rowe that she would not be</p> <p>19 receiving the head of financial services position</p> <p>20 that you had -- that you made that decision?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. Can you repeat the question, please?</p> <p>23 Q. Sure. The decision to put Stuart</p> <p>24 Breslow in that role, did you make the decision</p> <p>25</p>
<p style="text-align: right;">Page 239</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 refreshes my recollection so I'm not sure I ever</p> <p>2 internalized that, but it does suggest that it was</p> <p>3 a week's notice.</p> <p>4 Q. Okay. You can put that aside.</p> <p>5 MR. GAGE: I'm sorry, did you say</p> <p>6 something, Cara?</p> <p>7 MS. GREENE: I said you can put that</p> <p>8 aside.</p> <p>9 MR. GAGE: Okay, I didn't hear.</p> <p>10 Q. When did you decide that Stuart</p> <p>11 Breslow would take over the head of financial</p> <p>12 services role?</p> <p>13 A. Well, to -- to be precise, I don't</p> <p>14 agree that I decided that he would take over the</p> <p>15 head of financial services role. I asked him to</p> <p>16 play an interim role while we figured out what the</p> <p>17 strategy of the financial services industry</p> <p>18 would be, given some of the leadership changes</p> <p>19 which -- which is quite different. We put</p> <p>20 as -- as a earlier e-mail indicated, we had put</p> <p>21 the strat -- the vertical strategy essentially on</p> <p>22 pause when Thomas Kurian came in pending his</p> <p>23 blessing, for lack of a better word. So -- so I</p> <p>24 very specifically asked Stuart to be interim in</p> <p>25</p>	<p style="text-align: right;">Page 241</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 before or after you communicated to Ms. Rowe that</p> <p>2 she would not be getting the financial services</p> <p>3 vertical lead role?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. That would be before, as I believe</p> <p>6 the e-mail previously indicated. Meaning I had</p> <p>7 decided that Stuart would be the interim lead</p> <p>8 before I told Ulku that we were shutting down that</p> <p>9 search and if we reopened it that she would not be</p> <p>10 a candidate for it in -- in the future.</p> <p>11 Q. Did you consider Ms. Rowe for the</p> <p>12 interim position?</p> <p>13 A. I -- I did consider Ulku as a</p> <p>14 potential option for the interim role.</p> <p>15 Q. When did you consider her as a</p> <p>16 potential option?</p> <p>17 A. Roughly in the same time frame as I</p> <p>18 was -- as I indicated earlier, of making the</p> <p>19 decision on -- on Stuart doing that role.</p> <p>20 Q. Was there anyone else you considered</p> <p>21 as a possibility for the interim role?</p> <p>22 A. I don't believe so. I was looking at</p> <p>23 the existing team, not bringing anyone else onto</p> <p>24 to the team at the -- at that point. So it would</p> <p>25</p>